

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS ROBERT
CINTRON TO THE NATIONAL NEWSPAPER ASSOCIATION'S FIRST SET OF
INTERROGATORIES
(NNA/USPS-T1-1-8)
(May 26, 2021)**

The United States Postal Service hereby provides its responses to the National Newspaper Association's First Set of Interrogatories to United States Postal Service Witness Cintron, issued on May 19, 2021.¹ Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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¹ The Postal Service believes that NNA has exceeded the limit on interrogatories set forth in Rule 3020.117(a), pursuant to federal case law adopted by the Commission. Order No. 2080, Order Adopting Amended Rules of Procedure for Nature of Service Proceedings under 39 U.S.C. 3661 (May 20, 2014), at 44. Nevertheless, the Postal Service has chosen to respond to these interrogatories in lieu of filing a motion to be excused from doing so on numerosity grounds. The Postal Service's choice to accommodate NNA in this specific instance should not be construed as a waiver of the Postal Service's right to seek excusal from any further interrogatories by NNA on numerosity or other grounds, or from any arguably excessive interrogatories by any other party in any other instance.

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NNA/USPS-T1-1: Please refer to the On-Time Performance chart in your testimony on p.8.

- a. Please confirm that the primary data collection mechanism for deriving service performance statistics come from scans within the Informed Visibility system of mailpieces, bundles and containers with Intelligent Mail barcodes? If not, please explain other sources that would be used to compile these results.
- b. Please confirm that mail with Full Service Intelligent Mail barcodes is referred to by USPS as mail "in measurement" and that mail without such barcodes is considered not "in measurement." If you do not confirm, please explain your response.
- c. What percentage of Periodicals mail volume was considered "in measurement" in FY 2020?
- d. Does the Postal Service compile data on the percentage of newspaper mail within the Periodicals class that is "in measurement?" If yes, please provide the percentage of newspaper mail "in measurement." If not, please explain why the Postal Service does not compile such data.
- e. Relying on your personal expertise in the development of the USPS Informed Visibility system, do you believe the presence of newspaper mail in measurement has been relatively low compared to other types of mail? Please explain your response.
- f. If you confirm that newspaper mail in measurement has been relatively low compared to other types of mail, would you agree that the chart on p. 8 does not fully represent the actual service performance for newspaper delivery? Please explain your response.

RESPONSE:

- a. Confirmed.
- b. Confirmed. However, mail that has an Intelligent Mail Barcode and is Full-Service can still be excluded from service measurements for various reasons.
- c. Out of total Full-Service Periodicals, 71.81 percent were in service measurement in FY 2020.
- d. The Postal Service does not have data specific to newspapers. Newspapers are not a specific mail product. The Postal Service does not report

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newspaper-specific performance to the Postal Regulatory Commission.

- e. Yes. Periodicals have a lower percentage of overall volume, and newspapers' physical characteristics preclude passive scanning during sortation on our Mail Process Equipment (MPE).
- f. Service performance for Periodicals set forth in my testimony represents service performance for newspaper delivery to the extent it is tracked and reflected in Periodical service performance.

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NNA/USPS T1-2: Does the Postal Service produce reports of the percentage of newspaper bundles that receive scans within the Informed Visibility System? If so, please provide reports for the period since the existing service standards were adopted, i.e., from 2012 to date.

RESPONSE: No.

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NNA/USPS T1-3: Does the Postal Service produce reports of the percentage of newspaper containers that receive scans within the Informed Visibility System? If so, please provide reports for the period since the existing service standards were adopted, i.e., from 2012 to date.

RESPONSE: No.

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NNA/USPS T1-4: With respect to the Informed Visibility system and data as they apply to newspaper mail,

- a. Do you believe the Informed Visibility system produces consistently reliable data on the on-time delivery of newspapers?
- b. Do you agree that newspaper mail that is not sorted by automated sorting equipment would not receive barcode scans during mail processing, even if mailpieces contain Full Service Intelligent Mail Barcodes? If you disagree, please explain your response.
- c. Would you generally agree that to the extent local newspapers are entered at Delivery Units for delivery within that unit's 5-digit ZIP code area, Informed Visibility data would capture only information on container and/or bundles if any data at all are captured?
- d. Does the Postal Service produce reports on the percentage of DU-entered newspaper bundles and containers scanned into Informed Visibility reports? If so, please provide any relevant reports for FY 2020.

RESPONSE:

- a. Newspapers are not separated out from other Periodicals. The Informed Visibility system produces statistically accurate, reliable, and representative data at the mail class level for Periodicals.
- b. Disagree. Full-Service bundles may be handled/sorted by a manual bullpen in which containers scan may be performed. This may include Full-Service newspaper bundles.
- c. Agree, container scans can only be associated to bundles or pieces that meet the Full-Service requirements.
- d. No.

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NNA/USPS T1-5: With respect to a local newspaper publisher's mail entered at a Delivery Unit or an SCF for delivery outside the publisher's market area that would enter the end-to-end mailstream, do you agree

- a. That few of the mailpieces that enter the end-to-end mailstream receive IMb scans in mail processing?
- b. That few of the mailpieces that enter the end-to-end mailstream receive IMb scans at delivery?
- c. That in general, USPS relies upon scan data collected from magazine mailpieces, bundles and containers to compile statistics on service performance for Periodicals mail?

RESPONSE:

- a. This is unknown since newspapers are not separated from other Periodicals.
- b. The Postal Service does not scan every piece of mail (Letter/Flat) upon delivery to customers as that would be cost-prohibitive.
- c. The Postal Service relies on all scan data from Full-Service Periodical pieces to generate statistically representative service performance for Periodicals.

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NNA/USPS T1-6: Please explain your footnote 8 on p 11. Why does the Postal Service set service targets that are below the service standards?

RESPONSE: Service performance targets are targets to meet service standards.

Since service targets and service standards are not measurements of the same metric, one cannot be set "higher" or "lower" than the other.

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NNA/USPS T1-7: With respect to the use of air transportation to carry First-Class or Periodicals mail:

- a. Does the Postal Service routinely use air transportation to carry Periodicals?
- b. To the best of your knowledge, does the Postal Service routinely use air transportation to carry newspapers within the Periodicals class? Please explain your response.
- c. If your response to subparts a) and b) was that air transportation is rarely or never used for Periodicals mail, please explain why changes in First-Class mail service standards involving air transportation necessitates also changing service standards for Periodicals?

RESPONSE:

- a. No.
- b. No. By design, newspapers are to be dispatched on surface transportation. They will follow routings for FCM surface lanes or via the NDC network for FCM air lanes.
- c. Where periodicals and newspapers are transported on FCM surface transportation, the service standard is determined by the FCM service standard plus one day. For volumes remaining in the NDC network, no service standard change is expected.

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NNA/USPS T1-8:

With respect to locally-entered (DU or SCF) newspaper mail,

- a. Please confirm that newspapers entered at a Delivery Unit before the unit's CET for next day delivery will be unaffected by the proposed service standards change.
- b. Please confirm that newspapers dropped overnight at a Delivery Unit with an existing understanding that same-day delivery will be available will be unaffected by the proposed service standards change.
- c. Please confirm that the use of exceptional dispatch under DMM 707.28.3 by newspapers to achieve same-day or next day delivery, where available now, will be unaffected by the proposed service standards change.

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. Confirmed; the proposal does not impact the use of exceptional delivery under DMM 207.28.3.